

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JEROME L. JOHNSON,)	
)	
Plaintiff,)	No. 1:19-cv-00698
)	
v.)	
)	Honorable Ellen L. Hollander
BALTIMORE POLICE DEPARTMENT, <i>et al.</i>)	
)	
Defendants.)	

JOINT MOTION TO AMEND SCHEDULING ORDER

Plaintiff Jerome L. Johnson (hereinafter “Plaintiff”), Defendants Kevin Davis, Frank Barlow, Daniel Boone, and Gerald Goldstein (hereinafter the “Officer Defendants”), and Defendant Baltimore Police Department (hereinafter the “BPD”), pursuant to Federal Rule of Civil Procedure 16(b)(4), submit this Joint Motion to Amend the Scheduling Order to extend the deadline for filing dispositive motions, and state the following in support thereof:

1. On August 3, 2021, the Court approved an amended Scheduling Order, setting the deadline for dispositive pretrial motions on December 10, 2021. ECF No. 114.
2. The parties have consulted and now jointly request a further extension to the deadline for filing dispositive motions.
3. The parties together ask for this extra time because the expectation that there will be two summary judgment briefs (one from the Individual Defendants and a separate one from BPD), commitments in other ongoing matters, the recent departure of one of BPD’s attorneys and another being on extended leave, and the recent departure of one of Plaintiff’s longstanding attorneys from Brown, Goldstein & Levy. In addition, given the December holiday season, the parties have built in additional time to prepare their respective summary judgment submissions.

4. The extension requested by the parties would not unnecessarily delay the progress of the case.

5. Because all parties are requesting extensions, no party will be unfairly prejudiced.

6. The parties seek a modest two-week extension of the filing deadline, from December 10 to December 24. Because Plaintiff anticipate responding to two summary judgment motions, he seeks an extension until February 11 to file his response briefs. Defendants then seek an extension until March 4 to file their reply briefs.

7. Given the above, good cause exists for the requested extension and the parties propose that the Scheduling Order be amended as follows:

Current Deadline	Filing/Occurrence	Requested Deadline
December 10, 2021	Deadline for filing dispositive motions	December 24, 2021
December 24, 2021	Deadline for filing responses	February 11, 2022
January 7, 2022	Deadline for filing replies	March 4, 2022

For the foregoing reasons, the parties request that the Court grant this Joint Motion to Amend the Scheduling Order and extend the deadlines in the Scheduling Order as detailed above and in the Proposed Order.

Dated: December 7, 2021

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that I have caused true and correct copies of the above and foregoing to be served on all counsel of record via the Court's CM/ECF system, in accordance with the rules of electronic filing of documents, on December 7, 2021.

/s/
Kobie A. Flowers